

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FAN ZHANG, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON, JASON E.  
CHILD, JOSEPH M. DEL PRETO, ERIC P.  
LEFKOFSKY, THEODORE J. LEONSIS, PETER J.  
BARRIS, KEVIN J. EFRUSY, MELLODY HOBSON,  
BRADLEY A. KEYWELL, HOWARD SCHULTZ,  
MORGAN STANLEY & CO. LLC, GOLDMAN, SACHS  
& CO., CREDIT SUISSE SECURITIES (USA) LLC,  
ALLEN & COMPANY LLC, MERRILL LYNCH,  
PIERCE, FENNER & SMITH INCORPORATED,  
BARCLAYS CAPITAL INC., CITIGROUP GLOBAL  
MARKETS INC., DEUTSCHE BANK SECURITIES  
INC., J.P. MORGAN SECURITIES LLC, and WELLS  
FARGO SECURITIES, LLC,

Defendants.

Case No. 1:12-cv-02450

**NOTICE OF MOTION**

KATHLEEN ROSELLI, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ERIC P. LEFKOFSKY, ANDREW D.  
MASON, JASON CHILD, KEVIN EFRUSY,  
THEODORE J. LEONSIS, HOWARD SCHULTZ,  
JOSEPH M. DEL PRETO, MORGAN STANLEY & CO.  
LLC, GOLDMAN, SACHS & CO., and CREDIT SUISSE  
SECURITIES (USA) LLC,

Defendants.

Case No. 1:12-cv-02460

DENNIS EINSPAHR, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., JASON E. CHILD, JOSEPH M.  
DELPRETO, ANDREW D. MASON, ERIC P. LEFKOFSKY,  
PETER J. BARRIS, KEVIN J. EFRUSY, MELLODY  
HOBSON, BRADLEY A. KEYWELL, THEODORE J.  
LEONSIS, HOWARD SCHULTZ, MORGAN STANLEY &  
CO. LLC, GOLDMAN, SACHS & CO., CREDIT SUISSE  
SECURITIES (USA) LLC, ALLEN & COMPANY LLC,  
MERRILL LYNCH, PIERCE, FENNER & SMITH INC.,  
BARCLAYS CAPITAL INC., CITIGROUP GLOBAL  
MARKETS INC., DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR & COMPANY LLC,  
LOOP CAPITAL MARKETS, INC., RBC CAPITAL  
MARKETS LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

Case No. 1:12-cv-02547

JOHN PEDROW, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

GROUPON, INC., ANDREW D. MASON, JASON E.  
CHILD, JOSEPH M. DELPRETO, ERIC P.  
LEFKOFSKY, THEODORE J. LEONSIS, PETER J.  
NARRIS, KEVIN J. EFRUSY, MELLODY HOBSON,  
BRADLEY A. KEYWELL, HOWARD SCHULTZ,  
MORGAN STANLEY & CO. LLC, GOLDMAN,  
SACHS & CO., CREDIT SUISSE SECURITIES (USA)  
LLC, ALLEN & COMPANY LLC, MERRILL LYNCH,  
PIERCE, FENNER & SMITH INCORPORATED,  
BARCLAYS CAPITAL INC., CITIGROUP GLOBAL  
MARKETS INC., DEUTSCHE BANK SECURITIES  
INC., J.P. MORGAN SECURITIES LLC, WELLS  
FARGO SECURITIES LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL MARKETS, INC.,  
RBC CAPITAL MARKETS LLC and THE WILLIAMS  
CAPITAL GROUP, L.P.,

Defendants.

Case No. 1:12-cv-2791

JOHN H. COTTRELL, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

GROUPON, INC., ANDREW D. MASON, JASON E. CHILD,  
JOSEPH M. DELPRETO, ERIC P. LEFKOFSKY, PETER J.  
BARRIS, KEVIN J. EFRUSY, MELLODY HOBSON,  
BRADLEY A. KEYWELL, THEODORE J. LEONSIS,  
HOWARD SCHULTZ, MORGAN STANLEY & CO. LLC,  
GOLDMAN, SACHS & CO., CREDIT SUISSE SECURITIES  
(USA) LLC, ALLEN & COMPANY LLC, MERRILL LYNCH,  
PIERCE, FENNER & SMITH INC., BARCLAYS CAPITAL  
INC., CITIGROUP GLOBAL MARKETS INC., DEUTSCHE  
BANK SECURITIES INC., J.P. MORGAN SECURITIES LLC,  
WELLS FARGO SECURITIES, LLC, WILLIAM BLAIR &  
COMP ANY LLC, LOOP CAPITAL MARKETS, INC., RBC  
CAPITAL MARKETS LLC and THE WILLIAMS CAPITAL  
GROUP, L.P.,

Defendants.

Case No. 1:12-cv-3129

**NOTICE OF MOTION**

To: See Attached Service List

PLEASE TAKE NOTICE that at 10:30 a.m. on June 8, 2012, counsel for Movants, Mario Orlandi and Daniel Wright, will appear before the Honorable Charles Norgle, in Courtroom 2341 in the United States District Court for the Northern District of Illinois, and shall then and there present Movants' Motion to Consolidated Related Cases, be Appointed as Lead Plaintiffs and for Approval of their Choice of Counsel, a copy of which is herewith served upon you.

Dated: June 4, 2012

Respectfully submitted,

**COHEN MILSTEIN SELLERS & TOLL PLLC**

/s/ Carol V. Gilden  
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**Liaison Counsel for Movants and Proposed  
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**Attorneys for Movants and Proposed Lead  
Counsel for the Proposed Class**

**CERTIFICATE OF SERVICE**

I, Carol V. Gilden, Liaison Counsel for Movants and Proposed Liaison Counsel for the Proposed Class, certify that on this 4<sup>th</sup> day of June, 2012, I electronically filed this Notice of Motion of Mario Orlandi and Daniel Wright to Consolidate Related Cases, be Appointed as Lead Plaintiffs and for Approval of their Choice of Counsel with the Clerk of the U.S. District Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing

/s/ Carol V. Gilden